

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

REGINA LEWIS

Plaintiff,

v.

JOHNATHAN JACOBSON

JAMES SKOUFIS

SEAN PATRICK MALONEY

JOSEPH DONAT CITY MANAGER

CITY OF NEWBURGH

Defendants,

COMPLAINT

The court has jurisdiction pursuant to the Fed. R. Civ. P. Rule (2). Defendants are my representatives. However, collectively the defendants are discriminating against me. The defendant's behavior towards my requests for legislative assistance constitutes oppressive and discriminatory conduct consistent with violations of Hobbs Act and Obstruction Federal criminal statutes. I am personally being shunned and this is discrimination based on my race, gender, disability, and poverty because of the inability to make large campaign donations or to campaign. The defendants are concerned with the issuance of permits and construction. Generally, Senators have broad discretion in deciding whether and how to assist constituents. As stated in Senate Rule 43, it is a legitimate function of a Senator's office to intervene with officials of the executive branch and the independent regulatory agencies on behalf of individuals when the facts warrant. Senate Rule 43 further provides that:

At the request of a petitioner, a Member of the Senate, or a Senate employee, may communicate with an executive or independent government official or agency on any matter to —

- (a) request information or a status report;
- (b) urge prompt consideration;
- (c) arrange for interviews or appointments;
- (d) express judgments;
- (e) call for reconsideration of an administrative response which the Member believes is not reasonably supported by statutes, regulations or considerations of equity or public policy; or
- (f) perform any other service of a similar nature consistent with the provisions of this rule.

Even though I am the Chief Executive Officer of two legal entities (MAIN) Mothers Against Institutional Negligence, incorporated since November 19,2010 and (NEC) Newburgh Enrichment Center incorporated since December 10,2009, neither organization has received funding from any source and the defendants refuse to provide assistance through community constituent services. I have made numerous requests for legislative advocacy. The defendants refuse to engage in meaningful communication despite numerous promises. As CEO of MAIN, I have provided a service to NYS Prisoners with advocacy for wrongful incarceration or unconstitutional prison conditions. AS CEO of the Newburgh Enrichment Center, I propose a viable economic development plan for my focus group that at-risk underserved young Black African American males. The defendant Joseph Donat refuse to allow his scheduler to make an appointment. Since 2009, the City of Newburgh City Councilmembers, Managers and Mayors have all refused to allow me to be on the City's Agenda. I am being denied equal opportunity, funding, and other resources. I am unable to engage in meaningful communication with the defendants based on my race, gender, disability, and class. It appears based on the face of Newburgh New York, that the focus of campaigning is to provide incentives to non-African American to take up residency in the City of Newburgh, with an incentive of tax abatement and really cheap property and funding. As well construction and permits. Being denied support after presenting my cause to the defendants is one thing but being denied altogether without reason and then misinforming me that there is no information or resources available is unethical and corrupt.

According to the Senate information. Before the Coronavirus pandemic hit New York, the State Senate acted quickly to mobilize a response. It dedicated the necessary resources but also took steps to ensure continuity of government while observing public health directives critical to combating the growing pandemic. Despite these obstacles, the State Senate is obligated to meet the needs of New York residents and businesses. Read more about the 2020 - 2021 New York State Budget. SFY 2020-21 Economic and Revenue Forecast. In its simplest terms, legislative advocacy is working with individual lawmakers and lawmaking bodies to gain support for your cause or initiative, for the needs of a specific population, for an organization or group of organizations, or for specific services. Lawmakers' support can take several forms:

- A bill with funding attached. You might want to advocate with state or federal legislators to sponsor a bill which, if passed, would provide money to work on your issue or benefit

your target population. Much government-sponsored AIDS research has resulted from funding legislation that passed largely through the work of advocates and other activists.

- A bill with wording that supports a particular philosophy or helps to legitimize your issue. Such a bill might affirm the responsibility of government to deal with a particular problem or provide a particular service. Even if there is no money attached, having that wording pass into law makes it easier to get funding later, and makes the importance of the issue clearer to the community at large.
- A bill with regulations that benefit your target population or advance your cause. A welfare reform program that includes education and training for recipients, continued medical insurance for a period after people get off welfare, and other support services is far more likely to work to the long-term advantage of recipients, for instance, than one that simply pushes people off the rolls after a certain period of time.
- A local ordinance that supports your cause. Town Councils, Boards of Health, Conservation Commissions, and other local bodies can make regulations that promote particular health, social, or environmental agendas. §For example, in the past few years, many town Boards of Health have banned smoking in restaurants in order to protect non-smoking patrons from the effects of second-hand smoke. In some instances, local housing authorities evict from public housing the families of tenants who take part in racist activity.
- Budget advocacy. Federal, state, and local governments approve budgets each year. Groups often advocate to put new or more money in the budget for their issue; to get proposed funding levels approved by the whole legislative body and signed into law by the executive; or to reverse proposed cuts in funding.

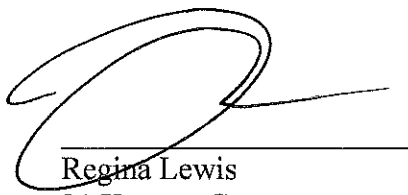
As you can plainly see, there are several services and plenty assistance that I am being denied and that is unethical conduct carried out by the defendants to intentionally discriminate and to deny me equal opportunity. There is no excuse or legal reason as to why the defendant City of Newburgh has engaged in discrimination and bias for over a decade. Defendants Skoufis, Jacobson and Maloney have told me that they have no idea as to funding or any service that can help me further my goals for myself and my organizations. Defendants James Skoufis, Johnathan Jacobson and Sean Patrick Maloney are liable for discrimination and obstruction. The defendants James Skoufis, Johnathan Jacobson and Sean Patrick Maloney have denied me legislative assistance and constituent services for as long as they have been in office. Defendant Joseph Donat has municipal

liability. The defendants collectively are denying me equal opportunity in violation of 42 U.S.C. § 1981 (a) (b) (c), 42 U.S.C. 1983, Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973, An act to replace the vocational rehabilitation act, to extend and revise the authorization of grants to states for vocational rehabilitation services, with special emphasis on services to those with the most severe handicaps, to expand special federal responsibilities and research and training programs with respect to handicapped individuals, to establish special responsibilities in the secretary of health, education, and welfare for coordination of all programs with respect to handicapped individuals within the department of health, education, and welfare, and for other purposes.

42 U.S.C. § 1981 (a). All persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, (R.S. § 1977; Pub. L. 102-166, title I, § 101, Nov. 21, 1991, 105 Stat. 1071.). The threshold inquiry is whether the evidence establishes that I have been deprived of a Constitutional Right *Duchesne v. M Sugarman* 566 F. 2d 817. This complaint is not a waiver of right to services from the defendants.

WHEREFORE, I seek damages in the sum of:

\$1,000,000 in damages from James Skoufis,
\$1,000,000 in damages from Johnathan Jacobson
\$1,000,000 in damages from Sean Patrick Maloney
\$1,000,000 in damages from Joseph Donat
\$1,000,000 in damages from City of Newburgh

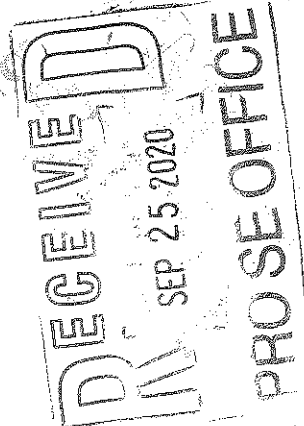


Regina Lewis
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September 23, 2020

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